

2020-009965-28



October 8, 2020

City of Portland
c/o liabilityclaims@portlandoregon.gov

RECEIVED

OCT - 8 2020

City of Portland-Risk Management

ORS 20.080 Demand

We've been retained by Ms. Valerie Arkell to prosecute a claim against you for battery, negligence, nuisance, and related constitutional torts. At approximately 11:23pm on August 23rd, 2020 while in her home, City of Portland police officers intentionally gassed and activated flashbangs in Ms. Arkell's neighborhood around NE Roselawn Street and NE MLK Jr. Blvd. This startled Ms. Arkell which caused her neck pain and uneasiness.

At approximately 11:42pm the same night while in her home, City of Portland police officers again intentionally gassed the area. The tear gas filled her home entirely and caused Ms. Arkell to feel a burning sensation in her eyes and difficulty breathing. She continued to experience a severe headache and lethargy in the 2-3 days following the gassing.

Please see the attached documentation of the claim reasonably available to our client. We will continue to provide documentation as we receive it. Please share this letter with your insurance adjuster. Under ORS 20.080, to settle this claim, send a check payable to OlsenDaines Trust Account for \$10,000 to OlsenDaines, 111 SW 5th Ave., Suite 3150, Portland, Oregon 97204.

Thank you.

Sincerely,

s/ Michael Fuller

US Bancorp Tower • 111 SW 5th Ave. • Suite 3150
Portland, Oregon 97204 • 503-222-2000

Partner

Enclosure

Documentation

US Bancorp Tower • 111 SW 5th Ave. • Suite 3150
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DON'T SHOOT_126899